

Carmen A. Nicolaou (CN-5518)

CHARTWELL LAW

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Attorneys for Defendants

Michel S. Wang, Victoria Wang as

Trustee of The Richardson Irrevocable Trust,

Terrance Wu, and Deh-Jung Deborah Wang

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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EDWARD SHIN,

Docket No.: 1:17 CV-05183 (SMG)

Plaintiff,

NOTICE OF MOTION

-against-

YSE ENTERPRISES, INC., MICHEL S. WANG, VICTORIA
WANG as TRUSTEE OF THE RICHARDSON
IRREVOCABLE TRUST, TERRANCE WU, DEH-JUNG
DEBORAH WANG, AND YOUNK K. LEE,

Defendants.
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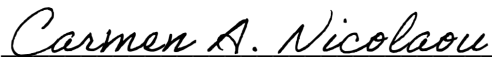
TO PLAINTIFF AND DEFENDANTS AND TO THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE, that upon the attached Certification of Carmen A. Nicolaou, Esq. dated April 3, 2020, Attorney Declaration of Carmen A. Nicolaou dated April 3, 2020 and there exhibits annexed thereto, Affidavit of Michel S. Wang sworn to on March 26, 2020 and exhibits annexed thereto, Rule 56.1 Statement of Facts, and the Memorandum of Law in Support, and upon all prior pleadings and proceedings had herein, defendants MICHEL S. WANG, VICTORIA WANG as TRUSTEE OF THE RICHARDSON IRREVOCABLE TRUST, TERRANCE WU, DEH-JUNG DEBORAH WANG (collectively “Wang Defendants”) by and through their attorneys Chartwell Law, will move this court before the Honorable Steven M. Gold,

United States Magistrate Judge, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza E., Brooklyn, New York 11201, on May 12, 2020 at 10:00 o'clock in the forenoon, or as soon thereafter counsel can be heard (or on any date agreed upon by the parties and accepted by the Court) pursuant to Federal Rule Civil Procedure 37 and the Local Rules of the United States District Court for Southern District, for an Order:

- a) granting summary judgment to Wang Defendants pursuant to Rule 56 of the Federal Rules of Civil Procedure (Fed. R. Civ. P. 56);
- b) dismissing the instant negligence action and all cross claims in its entirety; and
- c) granting such other and further relief as the Court may deem just and proper.

Dated: White Plains, New York
April 3, 2020



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Attorneys for Defendants

MICHEL S. WANG, VICTORIA WANG as

TRUSTEE OF THE RICHARDSON

IRREVOCABLE TRUST, TERRANCE WU, DEH-

JUNG DEBORAH WANG

CERTIFICATE OF SERVICE

I, **CARMEN NICOLAOU, ESQ.**, hereby certify that on September 27, 2019, the foregoing document, **NOTICE OF MOTION** served in accordance with the Federal Rules of Civil Procedure, and/or the Eastern District's Local Rules, and/or the Eastern District's Rules on Electronic Service, and by electronic service, upon the following parties and participants:

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CARMEN NICOLAOU, ESQ. (CN-5518)